

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST INDIES  
PETROLEUM, LTD

Defendant.

CIVIL NO. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**OBJECTION TO SUBPOENA DUCES TECUM**

**NOW COMES** non-party Total Safety Virgin Islands, LLC (“Total Safety”) through undersigned counsel DUDLEY NEWMAN FEUERZEIG LLP, Charles E. Lockwood, Esq., and pursuant to FED. R. CIV. P. 45(d)(2)(B) objects to the June 30, 2025 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (the “Subpoena”) served upon Dudley Newman Feuerzeig LLP on July 10, 2025. The Subpoena was served after the discovery deadline in this case and is overly broad and unduly burdensome.

Respectfully Submitted,

DUDLEY NEWMAN FEUERZEIG, LLP

Dated: July 21, 2025

By: /s/ Charles E. Lockwood  
CHARLES E. LOCKWOOD, ESQ.  
VI Bar No. 1112  
*Attorneys For Total Safety*  
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**EXHIBIT**

**3**

Email: [clockwood@dnfvi.com](mailto:clockwood@dnfvi.com)

**CERTIFICATE OF SERVICE**

**I HEREBY** certify that on this 21<sup>st</sup> day of July 2025, a true and correct copy of the foregoing ***OBJECTION TO SUBPOENA*** delivered via e-mail to:

Lee J. Rohn, Esq.  
Robin P. Seila, Esq.  
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/s/Charles E. Lockwood, Esq.